

14153-35
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

WILMER CATALAN-RAMIREZ,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:17-cv-03258
)	
RICARDO WONG, Field Office Director,)	
Chicago, U.S. Immigration and Customs)	
Enforcement ("ICE"); ICE AGENT JOHN)	
DOES 1-6; MCHENRY COUNTY,)	
MCHENRY COUNTY SHERIFF BILL PRIM,)	
CHIEF OF CORRECTIONS DAVID)	
DEVANE, CORRECT CARE SOLUTIONS,)	
HEALTH ADMINISTRATOR MIKE)	
KEEGAN, SUPERINTENDENT EDDIE)	
JOHNSON, COMMANDER CHRISTOPHER)	
KENNEDY, COMMANDER ALFRED)	
NAGODE, CHICAGO POLICE OFFICER)	
JOHN DOES 1-2, and CITY OF CHICAGO,)	
)	
Defendants.)	

**CORRECT CARE SOLUTIONS, LLC, AND MICHAEL KEEGAN, R.N.'S MOTION TO JOIN
MCHENRY COUNTY DEFENDANTS' MOTION TO SEVER AND TRANSFER MISJOINED
CLAIMS/PARTIES TO WESTERN DIVISION AND TO DENY PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION AS MOOT/OUT-DATED**

NOW COME Defendants, CORRECT CARE SOLUTIONS, LLC, and MICHAEL KEEGAN, R.N.,
by their attorneys HEYL, ROYSTER, VOELKER & ALLEN, and for their Motion to Join the McHenry
County Defendants' Motion to Sever and Transfer Misjoined Claims/Parties to Western Division

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(Court Doc. Nos. 61-63) and to Dismiss Plaintiff's Motion for Preliminary Injunction (Court Doc. No. 5) as Moot/Out-Dated, state:

1. Defendants Correct Care Solutions, LLC, and Michael Keegan, R.N., previously filed a motion to sever and transfer misjoined claims/parties to the Western Division (Court Doc. No. 25), which is incorporated herein by reference.

2. The Court dismissed the motion without prejudice on May 9, 2017.

3. The McHenry County defendants filed a similar motion to sever and transfer the same claims on May 25, 2017 (Court Doc. Nos. 61-63).

4. Defendants Correct Care Solutions, LLC, and Michael Keegan, R.N., move to join the McHenry County defendants' motion, and request that, if the claims against the McHenry County defendants are severed and transferred, the claims against Correct Care Solutions, LLC, and Michael Keegan, R.N. (Counts III and V), likewise be severed and transferred to the Western Division.

5. Defendants also request that Plaintiff's motion for a preliminary injunction (Court Doc. No. 5) be denied as moot/out-dated as all of the care requested in the motion has been provided to Plaintiff.

WHEREFORE, for the aforementioned reasons, Defendants, CORRECT CARE SOLUTIONS, LLC, and MICHAEL KEEGAN, R.N., respectfully request that this Court enter an order which grants them leave to join the McHenry County Defendants' motion to sever and transfer misjoined

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claims/parties to the Western Division (Court Doc. Nos. 61-63), deny Plaintiff's motion for a preliminary injunction (Court Doc. No. 5) as moot/out-dated and grant such other relief as this Court deems just and proper.

CORRECT CARE SOLUTIONS, LLC, and
MICHAEL KEEGAN, R.N

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PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing instrument, Motion to Join the McHenry County Defendants' Motion to Sever and Transfer Misjoined Claims/Parties to Western Division (Court Doc. Nos. 61-63) and to Dismiss Plaintiff's Motion for Preliminary Injunction (Court Doc. No. 5) as Moot/Out-Dated, was served upon all attorneys to the above cause via the CM/ECF System on the 26th day of May, 2017.

TO:

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